

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

)	
REBECCA BROWN and AUGUST)	
TERRENCE ROLIN, on behalf of themselves)	
and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	CASE NO. 2:20-cv-00064-LPL
)	
TRANSPORTATION SECURITY)	
ADMINISTRATION; DAVID P. PEKOSKE,)	
Administrator, Transportation Security)	
Administration, in his official capacity; DRUG)	
ENFORCEMENT ADMINISTRATION; UTTAM)	
DHILLON, Acting Administrator, Drug)	
Enforcement Administration, in his official)	
Capacity; "STEVE" LAST NAME UNKNOWN,)	
Agent, Drug Enforcement Administration, in his)	
individual capacity; and UNITED STATES OF)	
AMERICA,)	
)	
Defendants.)	
)	

CERTIFICATION OF COUNSEL

I hereby certify that I conferred with counsel for Plaintiffs by telephone and email on May 29, 2020, to determine whether the deficiencies identified in the Government Defendants' motion to dismiss could be cured by amendment.¹ Plaintiffs' counsel has informed me that, at this time, Plaintiffs do not intend to amend their complaint in response to the issues identified in the

¹ Counsel belatedly discovered the conferral requirement deadline and recognizes that the date of conferral above is not within the time required by the Court's January 16, 2020, order.

Government Defendants' motion, which I outlined for Plaintiffs' counsel during the parties' conferral.

Dated: May 29, 2020

/s/ Elizabeth Tulis

ELIZABETH TULIS

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division